

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(RICHMOND DIVISION)

GOLDEN BETHUNE-HILL, *et al.*,

Plaintiffs,

v.

VIRGINIA STATE BOARD OF
ELECTIONS, *et al.*,

Defendants.

Civil Action No. 3:14-cv-00852-REP-AWA-BMK

DEFENDANT-INTERVENORS' WITNESS LIST

Defendant-Intervenors the Virginia House of Delegates and Virginia House of Delegates Speaker William J. Howell ("Defendant-Intervenors"), through counsel, pursuant to the Order entered on June 2, 2017, and in response to Plaintiffs' Witness List filed on June 19, 2017, hereby identify the following fact witnesses who may present testimony at trial, and expert witnesses who may present written expert reports and may be designated to testify at trial.

Defendant-Intervenors reserve their right, as described in this Court's Order dated June 21, 2017, to identify additional witnesses by July 14, 2017.

I. Fact Witnesses

1. Delegate Chris Jones – a member of the Virginia House of Delegates and the architect of the redistricting plan at issue in this proceeding. He may testify about the plan and the 2011 redistricting process.
2. Delegate Barry D. Knight – a member of the Virginia House of Delegates representing a district that borders one or more districts challenged in this proceeding. He may testify about borders of his district created by the 2011 redistricting process.
3. Delegate Brenda L. Pogge – a member of the Virginia House of Delegates representing a district that borders one or more districts challenged in this

proceeding. She may testify about borders of her district created by the 2011 redistricting process.

4. Delegate Christopher K. Peace – a member of the Virginia House of Delegates representing a district that borders one or more districts challenged in this proceeding. He may testify about borders of his district created by the 2011 redistricting process.
5. Delegate Christopher P. Stolle – a member of the Virginia House of Delegates representing a district that borders one or more districts challenged in this proceeding. He may testify about borders of his district created by the 2011 redistricting process.
6. Delegate G. M. (Manoli) Loupassi – a member of the Virginia House of Delegates representing a district that borders one or more districts challenged in this proceeding. He may testify about borders of his district created by the 2011 redistricting process.
7. Delegate Gordon C. Helsel, Jr. – a member of the Virginia House of Delegates representing a district that borders one or more districts challenged in this proceeding. He may testify about borders of his district created by the 2011 redistricting process.
8. Delegate James P. Massie, III – a member of the Virginia House of Delegates representing a district that borders one or more districts challenged in this proceeding. He may testify about borders of his district created by the 2011 redistricting process.
9. Delegate John M. O'Bannon, III – a member of the Virginia House of Delegates representing a district that borders one or more districts challenged in this proceeding. He may testify about borders of his district created by the 2011 redistricting process.
10. Delegate M. Kirkland Cox – a member of the Virginia House of Delegates representing a district that borders one or more districts challenged in this proceeding. He may testify about borders of his district created by the 2011 redistricting process.
11. Delegate Riley E. Ingram – a member of the Virginia House of Delegates representing a district that borders one or more districts challenged in this proceeding. He may testify about borders of his district created by the 2011 redistricting process.
12. Delegate Roxann L. Robinson – a member of the Virginia House of Delegates representing a district that borders one or more districts challenged in this proceeding. She may testify about borders of her district created by the 2011 redistricting process.

13. Delegate Thomas Wright – a member of the Virginia House of Delegates representing a district that borders one or more districts challenged in this proceeding. He may testify about borders of his district created by the 2011 redistricting process.
14. Bill Janis – a former member of the Virginia House of Delegates who represented a district that borders one or more districts challenged in this proceeding. He may testify about borders of his former district created by the 2011 redistricting process.
15. G. Glenn Oder – a former member of the Virginia House of Delegates who represented a district that borders one or more districts challenged in this proceeding. He may testify about borders of his former district created by the 2011 redistricting process.
16. Dr. James W. Loewen – a professor of sociology who submitted an expert report in the case *West v. Gilmore*, CL01-84 (Va. Cir. Ct.). Dr. Loewen may testify for the purposes of admitting his report under the Federal Rules of Evidence, identifying relevant conclusions of his report, and explaining how his report was prepared.
17. John A. Cox – a former member of the Virginia House of Delegates who represented a district that borders one or more districts challenged in this proceeding. He may testify about borders of his former district created by the 2011 redistricting process.
18. John Morgan – a demographer who assisted Delegate Jones and the House of Delegates in drawing the 2011 map. He may testify about the 2011 redistricting process.
19. Robert Tata – a former member of the Virginia House of Delegates who represented a district that borders one or more districts challenged in this proceeding. He may testify about borders of his former district created by the 2011 redistricting process.
20. Senator John A. Cosgrove – a former member of the Virginia House of Delegates who represented a district that borders one or more districts challenged in this proceeding. He may testify about borders of his former district created by the 2011 redistricting process.

Defendant-Intervenors' submit this list of witnesses without waiving any of their rights, and specifically reserve the right to call any rebuttal or impeachment witnesses and to supplement this list if any listed witness becomes unavailable to testify at trial.

II. Expert Witnesses

1. Thomas Hofeller – Dr. Hofeller has been designated as an expert witness and may testify about the matters addressed in his expert report.
2. Trey Hood – Dr. Hood has been designated as an expert witness and may testify about the matters addressed in his expert report.
3. Jonathan Katz – Dr. Katz has been designated as an expert witness and may testify about the matters addressed in his expert report.

Dated: June 30, 2017

Respectfully submitted,

VIRGINIA HOUSE OF DELEGATES
AND VIRGINIA HOUSE OF DELEGATES
SPEAKER WILLIAM J. HOWELL

By Counsel

/s/ Katherine L. McKnight

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CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of June, 2017, the foregoing Defendant-Intervenors' Witness List was filed and served on all counsel of record pursuant to the Court's electronic filing procedures using the Court's CM/ECF system.

/s/ Katherine L. McKnight

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